Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	ET Docket No. 00-258
Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems	)	
	)	RM-9920
Petition for Rulemaking of the Cellular Telecommunications Industry Association Concerning Implementation of WRC-2000: Review of Spectrum and Regulatory Requirements for IMT-2000	)	
	)	RM-9911
Amendment of the U.S. Table of Frequency Allocations to Designate the 2500-2520/2670-2690 MHz Frequency Bands for the Mobile-Satellite Service	)	

To: The Commission

COMMENTS OF THE AMERICAN ASSOCIATION OF COMMUNITY COLLEGES AND THE ASSOCIATION OF COMMUNITY COLLEGE TRUSTEES

The American Association of Community Colleges (AACC) and the Association of Community College Trustees (ACCT) submit these comments in response to the *Notice of Proposed Rulemaking and Order* in the captioned proceeding, FCC 00-455 (released January 5, 2001). AACC and ACCT endorse and are signatories to the *Comments of the Education Community of the United States* ("Education Community comments") submitted in this proceeding. These comments are intended to supplement the education community's submission by highlighting the importance of the instructional television fixed service (ITFS) to the educational and community service missions of the nation's community colleges. AACC and ACCT urge the commission to

preserve the ITFS and MMDS allocations in the 2500-2690 Mhz band when allocating additional spectrum for third generation (3G) wireless services.

AACC is a nonprofit educational organization that serves more than 1,100 member community colleges located across the United States, which represents more than 90% of all of the community colleges in the country. More than 90% of these community colleges are public institutions. AACC works with other higher education associations, the federal government, Congress, and other national associations that represent the public and private sectors to promote the goals of community colleges and higher education.

ACCT is a nonprofit educational organization of governing boards, representing more than 6,500 elected and appointed trustees who govern over 1,200 community, technical, and junior colleges in the United States, Canada, and England. ACCT offers trustee training and professional development programs, educational programs, research and publications, extensive board services, and public policy advocacy.

Community colleges make up the largest individual sector of higher education, serving 10 million students annually, including roughly half of all undergraduate credit students in the country. Equitable and affordable access to higher education is a key component of the community college mission, and AACC and ACCT's member institutions are often the only available avenue into higher education for many of the students they serve. Community colleges are leaders in providing lifelong learning opportunities for students of all ages who wish to update their job skills or simply to develop a new hobby. Community colleges also work closely with industry, providing the nation's workforce with the training they need to keep abreast of an increasingly technological society.

For nearly four decades, ITFS has been a valuable educational tool for community colleges. Of the approximately 1200 ITFS licensees, 150-200 are community colleges. In addition, many other community colleges receive ITFS services from or provide programming to other licensees, including universities and K-12 school systems. Historically, community colleges have used ITFS to extend the reach of their educational offerings via the delivery of video content. Many community colleges are multi-campus institutions, and ITFS is used for the simultaneous delivery of a course to all the

campuses, when student interest on any one of the campuses by itself would not justify offering the course. In a similar fashion, community colleges often use ITFS to make courses available to far flung K-12 institutions in their service areas, when any one of those schools would not be able to offer the course itself. Community colleges also use ITFS for workforce development, delivering training directly to employees at their worksite. With the evolution of ITFS into a digital, two-way service, community colleges have been and are planning to enhance these institutional uses of ITFS in a number of different ways, including the utilization of interactive video and high speed data applications.

In California, for example, Palomar College has long used its ITFS spectrum to deliver courses to students across North San Diego County, many in rural communities who otherwise would not have access to this content. Recently, Palomar helped to form an educational consortium that has partnered with Worldcom Wireless Solutions, which in exchange for utilizing some of the ITFS capacity is providing revenue to the schools for the development of distance learning content, and is constructing a twenty-four channel digital broadcast system to over 600 educational sites throughout the county.

In Iowa, Kirkwood Community College presently uses its four ITFS channels to deliver live, interactive college credit courses and continuing education courses to its entire service area, which covers 4,300 square miles with a population of more than 350,000 people. ITFS is also used to transmit such content to cable systems that provide service to 34 communities in a 35-mile radius from the college. In the future, Kirkwood plans to use its ITFS system, in conjunction with a corporate partner, to deliver high speed Internet service to the K-12 schools in its service area. Kirkwood also plans to use ITFS to deliver video on demand at off campus Learning Centers that do not have access to the main campus' videotape library.

As noted in the Education Community comments, it is becoming increasingly important for higher education institutions to make their offerings available to students where and when they need them. Increasingly, this means the ability to deliver courses to students in their homes. This is especially true for community colleges, where approximately two-thirds of students also work full time. The average community college student is 29 years of age, and many have family obligations in addition to work

and school. More than one-third of our member institutions are located in rural areas, where distance from the campus alone can be a severe impediment to those wishing to further their education.

The need to reach students in their home has resulted in the explosion of "distance education" offerings made available by community colleges, especially over the Internet. These applications are rapidly becoming more sophisticated, and more bandwidth than that provided by a standard dial-up connection is required to use them. While most community colleges have high-speed Internet connections on their campuses, many are located in areas where no such service is readily available in homes. As noted above, more than one-third of community colleges are located in rural areas, and many are also located in other areas that do not have access to broadband Internet connections. A majority of the 150-200 community college ITFS licensees are located in such areas. Because of the geographic and economic impediments that have stifled the development of other broadband technologies in these areas, wireless technologies such as ITFS offer the best hope for the availability of broadband service in the foreseeable future. ITFS is, therefore, a key element in many community colleges' ability to fulfill their educational missions.

The importance of ITFS, however, extends beyond this educational mission and extends to the general interests of the communities our member institutions serve. Access to broadband services is increasingly necessary to full economic and cultural participation in our technologically driven society. Community colleges have played a leading role in preparing the nation's citizens for this reality by teaching the skills necessary to use new technology and by providing access to the technology itself. Many community colleges, for example, host community technology centers where local citizens can avail themselves of all the benefits that flow from access to advanced technology. The broadband networks that community college ITFS licensees are developing with their corporate MMDS partners are a significant extension of this tradition, enabling access to broadband services in individuals' homes.

In North Carolina, the planning process for such a network is well underway. 39 community colleges have joined with other institutions of higher education and public schools to form a statewide consortium to create a seamless web of lifelong learning. In

partnership with Wireless One of North Carolina, these institutions intend to build a wireless network that would provide two-way broadband connectivity across the state.

The North Carolina network and the Palomar and Kirkwood examples described above indicate how important the symbiotic relationship with corporate MMDS partners is to community college ITFS licensees. This relationship provides many benefits to community colleges, including revenue to develop educational content, and free or reduced-cost access to new ITFS capabilities. As the Education Community comments and others note, however, any relocation of ITFS services would destroy this partnership and the potential of ITFS both as an educational tool and as a means to bridge the "digital divide." AACC and ACCT urge the Commission to avoid this unfortunate outcome by preserving the 2500-2690 Mhz band for ITFS.

George R. Boggs
President
American Association of Community Colleges

Ray Taylor
President and CEO
Association of Community College Trustees